

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA)

)

)

v.)

Case no. 1:14-CR-306-GBL - 8

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MANUEL E. PAIZ GUEVARA)

MOTION FOR CONTINUANCE

MOTION SUMMARY

Counsel for defendant moves for a continuance. Lead Counsel has been recently diagnosed with a serious ailment which will necessitate medical testing, treatment, and recuperation over an extended time. Medical providers advised Lead Counsel on January 7, 2016 he will not be available for any extended trial for several months.

MOTION FOR CONTINUANCE

COMES NOW, Manuel E. Paiz Guevara, defendant herein and files this, his motion for continuance and moves thereby that the matter, presently set to commence trial on March 21, 2016.

1. That lead counsel was diagnosed with a serious illness on December 11, 2015.
2. That follow-up examination was conducted on December 22, 2015.
3. That on January 7, 2016 an examination with a medical provider specialist was conducted during which courses of treatment and providers were discussed.
4. That it is reasonably anticipated that counsel will be involved in treatment evaluations, treatment and recuperation for several months, such time, as yet undetermined due to the stage of the illness.
5. That it has been recommended by medical providers counsel should immediately commence evaluating treatment options and treatment providers.
6. Following selection of treatment options, treatment providers and treatment, a period of recuperation and healing is expected, such time to extend several months into the future.
7. The scheduling and examination by health care providers will likely occur during times and on dates for which this case is set and at locations other than the Alexandria Division of the Eastern District of Virginia.
8. That during the time of treatment evaluations, selection, and the choice of providers, it is highly likely counsel will be distracted from his obligations

to his client which may jeopardize the defendant's effective assistance of counsel.

9. If any further verification of the illness or the medically recommended courses of treatment are required, the same will be provided if known and provided when known.

WHEREFORE, premises considered, Learned Counsel moves the court to schedule a hearing, at the court and parties' earliest available opportunity, to enable evaluation of movant's request. Movant prays for general relief.

Respectfully submitted,

MANUEL E. PAIZ GUEVARA

By: _____/S/_____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Motion for Continuance was duly served all parties and all other defendants in this matter by the Court's electronic filing system.

/s/ David P. Baugh
David P. Baugh